

**IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF TEXAS SAN  
ANTONIO DIVISION**

La Unión Del Pueblo Entero, *et al.*,

Plaintiffs,

v.

Gregory W. Abbott, *et al.*,

Defendants.

No. 5:21-cv-00844-XR

**INTERVENOR-DEFENDANTS' RESPONSES AND OBJECTIONS TO  
LULAC PLAINTIFFS' RULE 26(a)(3) DISCLOSURES**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (collectively, the "Intervenor-Defendants"), lodge the following objections and responses to the Rule 26(a)(3) pretrial disclosures filed by the LULAC Plaintiffs. *See* ECF No. 689.

Intervenor-Defendants expressly join, and incorporate herein by reference, all responses and objections lodged to the LULAC Plaintiffs' pretrial disclosures by any party to this litigation, including State Defendants. Intervenor-Defendants also expressly reserve the right to supplement, modify, or add to these responses and objections. Consistent with the parties' meet-and-confer conversations, Intervenor-Defendants are not required at this time to lodge any responses or objections to Private Plaintiffs' deposition designations of witnesses whom Private Plaintiffs have identified as will call live witnesses for trial.

**LULAC Plaintiffs' Deposition Designations For Yvonne Ramon (30(b)(6)) (May 10, 2022)**

<u>LULAC Plaintiffs' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
26:15-27:10	Fed. R. Evid. 701 (improper opinion testimony on legal question)	
70:25-71:4	Fed. R. Evid. 701 (improper opinion testimony on legal question)	
114:21-25	Fed. R. Evid. 701 (improper opinion testimony on legal question)	

August 15, 2023

Respectfully submitted,

/s/ John M. Gore

John M. Gore

E. Stewart Crosland (*pro hac vice*)

Louis J. Capozzi III (*pro hac vice*)

JONES DAY

51 Louisiana Avenue, N.W.

Washington, D.C. 20001

Phone: (202) 879-3939

Fax: (202) 626-1700

jmgore@jonesday.com

scrosland@jonesday.com

lcapozzi@jonesday.com

*Counsel for Intervenor-Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 15, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to all counsel of record.

/s/ John M. Gore